



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

A handwritten signature in black ink, appearing to read "LORNA G. SCHOFIELD".

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

December 23, 2022

**By ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Application GRANTED.** Defendants shall answer, move or otherwise respond to the Complaint by **January 20, 2023**. The initial pretrial conference is **ADJOURNED to February 8, 2023, at 4:10 P.M.** The parties shall submit the required joint letter and proposed case management plan by **February 1, 2023**. No further extensions will be granted absent compelling circumstances. So Ordered.

**Dated: December 27, 2022**  
New York, New York

Re: *Roxana Agiilo et al. v. City of New York et al.* 22-cv-9204 (LGS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, attorney for Defendants City of New York ("City"), and New York City Police Department, in the above-referenced matter. Plaintiff's Complaint alleges that on multiple occasions the Defendants failed to provide translators or communication technology to people who are deaf in violation of the Americans with Disabilities Act, New York State law, and New York City law. I write jointly with Plaintiff's counsel to request 1) an extension, *nunc pro tunc*, of the deadline for the Defendants to Answer the Complaint; and 2) that the Court adjourn the upcoming initial pre-trial conference and joint letter and proposed case management plan

On November 14, 2022, the Complaint was filed, with electronic summons issued for the Defendants on November 15, 2022. Thus, the Defendants Answer was due on December 6, 2022. The Defendants apologize for missing this deadline, which was not calendared properly by my office and so the case just arrived on my desk this week. Defendants now request an extension, *nunc pro tunc*, for the Defendants to file an answer within 30 days from today, which is January 20, 2023. This is the first request for an extension to answer. Plaintiff consents to this request.

On November 16, 2022, the Court ordered the Parties to attend a telephone conference on January 4, 2023 and submit a joint letter and proposed case management plan before the conference by December 28, 2022. The Parties now jointly request that this telephone conference and submission be adjourned until early February to provide the Defendants with time to Answer and the parties to confer about a discovery schedule. The Parties are generally available during the week of February 6, 2023 for this telephone conference, should the Court grant this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Jay Cullen

Jay Cullen  
Assistant Corporation Counsel

cc: **By ECF**

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